UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2405

OCT 2 3 1990

Ref: 8AT-AP

Harry Keltz
Montana Air Quality Bureau
Department of Health and Environmental Sciences
Cogswell Building
Helena, Montana 59620

Re: Enforceability of the Opacity Limit at Primary Aluminum Reduction Plants Subject to NSPS Subpart S

Dear Harry:

On August 20, 1989, Kris Knutson, of my staff, and Jeff Bryan, of EPA's Montana Office, met with you and Don Ryan, of Columbia Falls Aluminum Company (CFAC), to discuss the unenforceability of the opacity limit for the potroom groups at CFAC (ARM 16.8.1503) due to multiple plume interference. Mr. Ryan believed that the Federal New Source Performance Standard for primary aluminum reduction plants (Subpart S) was also unenforceable. Thus, he felt that neither CFAC nor the Air Quality Bureau needed to address the unenforceability of ARM 16.8.1503.

Kris Knutson agreed to research the enforceability of the opacity limit at facilities subject to Subpart S. She spoke with EPA Region IV about the Alcan facility in Sebree, Kentucky, and the Alumax facility in Mt. Holly, South Carolina. Both of these facilities are prebake plants, whereas CFAC uses the Soderberg process. According to Region IV, there are typically no visible emissions from the potroom groups at these facilities. Visible emissions, when they do occur, are isolated incidents and there is no problem with interference of plumes. Therefore, Region IV believes that the opacity limit contained in Subpart S is enforceable.

In contrast, as you know, there is a multiple plume interference problem at CFAC which makes a valid Method 9 observation very difficult. Therefore, we strongly encourage the Bureau to continue its efforts to address the unenforceability of ARM 16.8.1503. Please let me know if we can provide any further assistance.

Sincerely,

Marius J. Gedgaudas, Chief
Compliance Section

M.C. Lee Smith
T.F. Payne
A.J. Conover
T.T. Furlong

cc: Don Ryan, CFAC
Jeff Bryan, 8MO